DOCUMENT RESUME

ED 147 465 CE 012 538

AUTHOR Holbrook, D. W.
TITLE Statement Regarding Proposed Trade Regulation Rule Concerning Proprietary Vocational and Home Study Schools.
PUB DATE Jan 76
NOTE 21p.; Statement presented at the Federal Trade Commission Hearing (Chicago, Illinois)

EDRS PRICE MF-$0.83 HC-$1.67 Plus Postage.
DESCRIPTORS Academic Standards; *Accreditation (Institutions); *Correspondence Schools; *Educational Accountability; Educational Responsibility; Governing Boards; *Government Role; Peer Evaluation; Professional Associations; *Proprietary Schools; School Administration
IDENTIFIERS *National Home Study Council; United States, *Federal Trade Commission

ABSTRACT

Voluntary accreditation is considered to be the strength of the American educational system. Presently, the Council on Postsecondary Accreditation (COPA) is the umbrella organization in the field of accreditation representing approximately 7,000 colleges, universities, and professional programs. The major mandate of COPA is to build and strengthen the concept of voluntary nongovernmental accreditation in America. The National Home Study Council (NHSC), an association of proprietary correspondence schools and a member of COPA, created an independent Accrediting Commission in 1955. The key to the increased effectiveness of NHSC during the past ten years is its evaluating-accrediting process which has these elements: (1) it is voluntary, (2) it is nongovernmental, (3) it depends on peer evaluation, and (4) its major concern is to stimulate educational quality and improve educational processes and skills. The Federal Trade Commission has hampered the growth of quality education by correspondence schools in the past few years with ill-advised regulations. The rules ignore the work being done by the Accrediting Commission leaving it no leverage to insure higher standards. If these rules are enforced the NHSC may have problems because (1) it is impossible to tell prospective students the percentage who will get the jobs for which they have been trained as the regulations require and (2) the required publication of drop-out rates would be very difficult and practically meaningless. (EM)

****
* Documents acquired by ERIC include many informal unpublished *
* materials not available from other sources. ERIC makes every effort *
* to obtain the best copy available. Nevertheless, items of marginal *
* reproducibility are often encountered and this affects the quality *
* of the microfiche and hardcopy reproductions ERIC makes available *
* via the ERIC Document Reproduction Service (EDRS). EDRS is not *
* responsible for the quality of the original document. Reproductions *
* supplied by EDRS are the best that can be made from the original. *
****

ED147465

STATEMENT

of

D. W. HOLBROOK
President
Home Study Institute

Regarding

PROPOSED TRADE REGULATION RULE
Concerning
PROPOSED TRADE REGULATION RULE
Concerning
PROPRIETARY VOCATIONAL AND HOME STUDY SCHOOLS

Presented at

FEDERAL TRADE COMMISSION
HEARING

Chicago, Illinois

JANUARY 1976

PERMISSION TO REPRODUCE THIS MATERIAL HAS BEEN GRANTED BY

D. W. Holbrook

TO THE EDUCATIONAL RESOURCES INFORMATION CENTER (ERIC) AND USERS OF THE ERIC SYSTEM."

U.S. DEPARTMENT OF HEALTH EDUCATION & WELFARE NATIONAL INSTITUTE OF EDUCATION

THIS DOCUMENT HAS BEEN REPRODUCED EXACTLY AS RECEIVED FROM THE PERSON OR ORGANIZATION ORIGINATING IT. POINTS OF VIEW OR OPINIONS STATED DO NOT NECESSARILY REPRESENT OFFICIAL NATIONAL INSTITUTE OF EDUCATION POSITION OR POLICY.

My name is D. W. Holbrook. I am an educator and an ordained minister. I've spent nineteen years in education in the United States and eleven years as a missionary for the Seventh-day Adventist Church in Latin America. I was a supervisor of 160 elementary schools in Bolivia, and later president of Inca Union College in Lima, Peru. I am part of five generations of Holbrooks who have served or are currently serving as missionaries in Latin America. My family is strongly church-oriented and service-oriented -- it's in our blood.

I have a masters degree in Middle Eastern Archeology and a doctorate in Educational Administration from the University of Nebraska. The emphasis in my doctoral studies was in the field of comparative world education and my dissertation involved a study of religious and political pressures on the school systems of Latin America, a study that I now find very fascinating because of current concerns in American education.

One of the major findings in my thesis was that political and religious pressures to control school systems are in the long range almost invariably counterproductive for everyone -- the government, the church, and the schools. This is significant in the situation we find ourselves in today as we seem to be moving in America into an age when the federal government is vigorously seeking to, I believe, over-control American education to the hurt of students, parents, schools, and the nation.

At the present time I am engaged in five areas of activities:

1. I have been president of Home Study Institute for the past ten years. HSI provides the correspondence education services for the Seventh-day Adventist

Church school system around the world. The Seventh-day Adventist Church has traditionally concentrated in developing hospitals and schools. The church operates, depending on how you use your statistics, either the largest or the second largest Protestant parochial school system in the world. We have graduated approximately 150,000 students and we operate as a non-profit school.

2. I am also involved in management training as associate director of the Christian Leadership Seminars, a project that provides in-service training for the middle managers of the church.

3. I'm the director of Home and Family Service, an office that provides workshop and seminar materials designed to strengthen family life in America.

4. I'm a board member of the newly formed Council on Postsecondary Accreditation. COPA is the result of a merger between the Federation of Regional Accrediting Commissions of Higher Education and the National Commission on Accrediting. I represent the National Home Study Council on COPA.

5. I am a Commissioner of Accreditation for the National Home Study Council.

I belong to the following professional associations or organizations: the National University Extension Association, the National Home Study Council, the Adult Education Association of the USA, the International Council for Correspondence Education, the American Association for Higher Education, the National Education Association, the National School Public Relations Association, American Management Associatin, the National Management Association, and Phi Delta Kappa.

I have been a member of the National Home Study Council for ten years and

specifically I represent today the Accrediting Commission of the National Home Study Council. I've been a Commissioner for six years.

I have served on evaluating teams visiting more than 40 correspondence schools for accreditation or re-accreditation and a number more that didn't make it.

For a number of years I have found myself in an unusual position in American education. There are two major professional bodies in correspondence education in American today -- the Independent Study Division of the National University Extension Association and the National Home Study Council. When I arrived at Home Study Institute in 1965 the Institute was a member of NUEA. I decided that I very much wanted to become a thorough-going professional in the field of correspondence education. I discovered that NUEA offered a lot -- it offered contact with the people who are experts in producing sound study materials. I took a careful look at the National Home Study Council. I discovered that they offered a lot. They offered contact with the people who are experts in producing materials especially in occupational fields that really teach skills effectively. Through annual Workshop Seminars floods of printed educational materials and frequent opportunities to rub shoulders, compare notes, observe and study closely a wide variety of correspondence schools I found all the opportunity I needed to grow in my profession. As a private school president serving a group of colleges and universities, I became a member then of both organizations, and for many years I was the only educator in America holding membership in both. Now there are several more.

I've not only been involved in evaluating other schools for accreditation purposes but I've been through the process with HSI which has been accredited and re-accredited.

Furthermore, I have served both as chairman and team member on evaluating commissions for the National University Extension Association to pass on applications for membership.

Let me spend a few minutes summarizing accreditation in America, because it is important to take an overall look at what's happening today, and how the proposed FTC regulations will affect me.

Each country in the world wants to have good schools. How they define "good" depends on what their particular culture and national goals demand. The vast majority of countries, in order to have good schools, have established ministries of education. We have never had a ministry of education in America and I fervently hope that we never will. The office of education in HEW was never planned to be a ministry of education, a ministry that controlled a national education system. The distinction is extremely important. In America legally, constitutionally, the major burden of education is on the state and the local school system. Instead of ministries of education attempting to monitor, control, and improve the quality of education in America, voluntary accreditation has developed and it is unique to America. And curiously enough, other governments, other educators, and other nations have been very envious of the system and are attempting at the present time to develop some kind of accreditation.

The purpose of voluntary accreditation is to insure quality education and to eliminate diploma mills. I worked as an educator in Latin America for eleven years. Since that time I have done educational surveys in 28 different countries. It is my abiding conviction that the last thing we want is a national school system controlled by the federal government. There is a reason why most students around the world dream of coming to America to study.

The richness and diversity of educational opportunities here is like no other place. We have problems; of course, we also have great strengths and voluntary accreditation is one of the major reasons for our strengths.

Accreditation has been around a long time. The North Central Accrediting Association began 80 years ago and is generally considered the grandfather of all the accrediting bodies. It's not generally known that the New England Association is even older. Even before that the concept of accreditation was growing. The University of Michigan was accrediting high schools for purposes of acceptance of high school graduates as far back as 1871. Twenty-five years ago the various accrediting associations began to group together in associations of accrediting associations. The regional accrediting associations formed the Federation of Regional Accrediting Commissions of Higher Education (FRACHE). At the end of last year they had 2,400 members. The various professional bodies such as doctors, architects, nurses, lawyers, musicians, and educators all had specialized professional accrediting associations and they united under the National Commission on Accrediting. As of last year, they were accrediting 3,600 programs.

The Council on Postsecondary Accreditation was formed on January 15, 1975 by uniting FRACHE and NCA and adding four private accrediting bodies that between them were accrediting about 1,000 schools. Included among the four private accrediting bodies is the independent Accrediting Commission of the National Home Study Council. The Accrediting Commission of the National Home Study Council provides a unique service to American education that no one else can provide. It works hard at improving private and proprietary correspondence education. Remember that the National Home

Study Council is where business and education come together to assure and improve quality education and yet stay alive as a school without federal tax monies to keep the program rolling. The growing stature in American education of the National Home Study Council and especially the independent Accrediting Commission of the National Home Study Council is demonstrated by its acceptance in first, the National Commission on Accrediting and then COPA. COPA now is the umbrella organization in America in the field of accreditation representing approximately 7,000 colleges, universities, and professional programs. The major mandate of COPA is to build and strengthen the concept of voluntary non-governmental accreditation in America.

We talk frequently of a triad of 1) government eligibility, 2) state approval, and 3) voluntary accreditation. All three are concerned about good education. And on paper, theoretically, the three ought to be able to work together to guarantee quality education in America. Unfortunately, the three corners of the triad are not working together smoothly. The proposed FTC regulations are only a part of a flood of rules and regulations coming out of the office of education and the FTC which are in effect making survival very difficult for private schools. I am persuaded that whatever problems have been involved in accreditation are insignificant in comparison with its strengths. The segments of federal government are moving fast to control education in America. Accrediting bodies may well be the only major bulwark left to help us keep the rich diversity that we have that is the envy of the world.

The National Home Study Council was organized in 1926 as an association of proprietary correspondence schools. Twenty years ago in 1955 the National Home Study Council took a major step forward in creating the independent Accrediting

Commission. After six years as a member of that Commission I would like to emphasize the word independent. This is the only accrediting commission in America with a majority of public members. The basic purpose for the establishment of the independent Commission on Accrediting by the National Home Study Council was the same as that involved in the establishment and work of all accrediting bodies -- to improve the quality of education, to upgrade the correspondence educators, to weed out the diploma mills, and to serve as a warning system to the public. Accreditation does not enforce uniformity. It is the best single guarantee that we have of rich and effective diversity in American education.

What accreditation basically says is, "This school is doing what it aims to do." "Its claims are not fraudulent." "It has reasonable educational objectives and it provides educational services and furnishes instructional materials that can be expected to achieve the objectives that the school is aiming for."

Accreditation says to prospective students, "This school has a good track record of doing its part if you will do yours."

My school (ISI) has been a member of the National Home Study Council for almost ten years and I have watched NHSC from a unique vantage point. I am not primarily profit-oriented. I am in touch with the three groupings of correspondence educators in America -- the universities, the proprietary schools, and the Bible correspondence schools. I can say emphatically that the Accrediting Commission of the National Home Study Council has over the past ten years made great strides towards its objectives. Let me tell you why.

1. A comparison of a typical study guide of any course in any school 20 years ago and today shows amazing differences -- thanks almost entirely to accreditation.

2. The history and the steady upgrading of minimum standards for accreditation over the past 20 years is self-evident. Whenever a problem became apparent the Commission moved to insist on higher standards to maintain accreditation. For example, I have with me the latest copy of the business standards and a copy of the procedure for adopting new standards and policies. The point I would like to make is that there is a constant study and refinement of standards and policies all tending to upgrade and the process has gone on every year that I have been involved with NHSC.

3. NHSC was the first in the nation as far as I have been able to discover to establish a refund policy. I have with me a brief review of the history of the cancellation and settlement policies from 1926 to 1976.

Through the past ten years I have watched as the National Home Study Council has grown in effectiveness It is more effective today because it is improving correspondence education in America. And the evaluating-accrediting process followed by NHSC is the key to that effectiveness. It has always been fascinating to me to watch the observers from federal and state offices who are regularly invited on evaluation visits. I have never yet seen one go away without being mightily impressed. I'm amazed that some people in government seem to think that they can really improve on this process. We must not destroy the effectiveness of voluntary accreditation in America. We must not destroy the effectiveness of the independent Accrediting Commission for proprietary correspondence schools. It has made correspondence

education strong. I would like to be more specific. What I mean by effectiveness is the following: I have seen major correspondence schools absorbed by large corporations whose interest was in dollars, not in education. Such corporations immediately began changing school policies and found themselves at odds with the independent Accrediting Commission as they wrestled with the problem and removed the accreditation when it became evident that corporate policies would not be changed. The schools are no longer accredited nor are they functioning effectively as correspondence schools and the signal has been a healthy one to the entire industry.

How does the accreditation process work? Let's assume that you would like to launch a correspondence school to train Federal Trade Commission examiners. Years from now you're about to retire, you would enjoy passing on to others the expertise that you've learned through your career and so you write a text, prepare study materials, probably put some lecturers and case studies on cassettes, put together a package, let people know it's available and you go into business. This is not an unusual process. A large number of correspondence schools start just this way. Many of them are successful because they're first concerned with education and second, they realize this is also a business. The National Home Study Council provides an abundance of advice and guidance in both areas.

What are the steps you would take then to become accredited? Your school is rolling -- it is almost two years old, you have some students, so 1) You decide to seek accreditation and you apply. 2) You prepare the famous SER -- Self-Evaluation Report. This is a well-developed instrument to help you make thorough going, detailed self-evaluation of your school. Such self-evaluations usually take from 2 to 9 months depending on the size and complexity of your school. The SER is detailed

and thorough; it covers every conceivable facet of operation. The SER is finished by you and your staff and sent to the NHSC. 3) Subject specialist (professional specialists in content areas) then review your courses. Several other recognized experts in the area of FTC hearings review the study guide, the text, the cassettes, all of the materials that you have put together. The subject specialists submit their reports to the Accrediting Commission and those reports are confidential. 4) An examining committee is appointed to visit your school. The committee includes education experts, management specialists, subject specialists, and observers - who serve voluntarily. They are compensated only for their travel expense. The purpose of the visit is to review and verify the information in the SER. It is a fact-finding process. The evaluation committee does not make decisions as to your accreditation. All of the members write individual reports that are combined into the chairman's report to the Accrediting Commission. That report includes your strengths, your weaknesses, problems, suggestions. 5) The Accrediting Commission meanwhile has been checking on your school's reputation, its integrity, your status with the VA, with the FTC, with Better Business Bureaus. Is there evidence of fiscal responsibility? Of good service to students? Some of your students are quizzed. 6) The Commission then decides on the basis of all the information it has received whether or not you merit accreditation.

There are 4 possibilities open to the Accrediting Commission: 1) You may be accredited. 2) You may be accredited with stipulations that must be met by a certain time. 3) You may be deferred until more reports or progress reports come in. 4) You may be denied. If you are denied there is an appeal procedure for such denial.

I would like to emphasize here that the accreditation process has these elements about it:

1. It is voluntary. You do not have to be accredited. There are some schools in America that are quality schools and yet they are not accredited because of the particular nature of their school; they feel they don't need it and they are surviving. Those schools are very few. Most, but not all, non-accredited schools do not measure up. Non-accreditation simply says to prospective students, "You better find out why the school is not accredited."

2. It is non-governmental -- this is important. The cost in taxes for the government to do as well as the accrediting commission would be enormous.

3. It depends on peer evaluation. Some say that this is not an unmixed blessing. There have been challenges. NHSC avoids putting on teams educators from schools that are in direct competition with the school being evaluated. Whatever its criticisms, the advantages far outweigh the disadvantages.

4. The major concern of accreditation is to stimulate growing educational quality, to aid in the improvement of educational processes, and in the skill of the educators. It is more than the simple adherence to certain standards. I do not want to be misunderstood. Standards are important. But freedom to grow and develop far beyond standards is more important. I suppose this could be called "The Theology of Accreditation." We have both the law and grace; and we need both in trying to keep a healthy balance to effectively serve the consumer, our students.

The important point here is that voluntary accreditation is not primarily concerned with putting schools out of business, but with improving schools. Therefore, voluntary accreditation tends not to be arbitrary and capricious; it tends to be helpful and understanding. And the process is manned by literally thousands of volunteers in America -- a force of expertise the federal government could never marshall in its efforts to insure good education.

I am sorry that I have to say to you today the Federal Trade Commission in the past few years has been no help whatsoever to the processes of voluntary accreditation by the National Home Study Council. For years, FTC was very helpful in reporting problems to the National Home Study Council -- now we only get a curt "It's none of your business" kind of response. The FTC has been part of an all too effective move to stunt the growth of quality education by correspondence schools. Intentionally or unintentionally is beside the point. I am no judge of motives. I only have to tell you what I have seen and heard. Over the past few years my colleagues sense that they are in a fight for their lives. They believe that we must keep correspondence education alive and growing. But the past few years about all I have heard hasn't been how to improve the quality of our teaching. I've heard little on new learning theories and very little on improved audio-visual techniques. We're talking very infrequently about new methods for guaranteeing learning. Now the time and the nervous energy of correspondence educators is consumed with how to deal with this new regulation, how to get around that impossible ill-advised rule.

Even with the best of intentions the Federal Trade Commission is overwhelming us;

it's suffocating us with sadly ill-advised regulations. This is a classic case of overkill.

I object to these rules for the following reasons.

1. These rules ignore the good work that has been done and is being done by the Accrediting Commission of the NHSC -- at no cost to the taxpayer. These rules ignore the progress in upgrading schools over the past 20 years and in effect say, "We'll solve whatever problems exist with these federal regulations. You accrediting people haven't done the job." I marvel at such a naive attitude.

2. If these rules are adopted, I see no reason for the continued growth and development of voluntary accreditation. Obviously, the government will have to watch and enforce these regulations. I doubt if anyone in FTC really knows what that means. As a school president I want to emphasize -- there will be no need for the Accrediting Commission to be trying to insure quality schools if the government is going to try to do it. Why should I put my school money into the accrediting process if the government is deciding whether I am o.k. or not.

4. The Accrediting Commission will have virtually no leverage to insure higher ethical standards. It seems quite obvious too that with a weakened voluntary accrediting system it will be more difficult to get top-rate people for the accreditation process. Futhermore, and I believe this is important, in the minds of our public accreditation is the single strongest recommendation that we have. If the FTC now becomes the approving agency or some combination of FTC and the office of education, if they can work together, this will only thoroughly confuse the picture.

5. The Accrediting Commission has spent 20 years in developing and refining reasonable rules. They now go down the drain. What kind of miracle workers do we have in the FTC that can replace that with an even better system overnight?

6. I object to the obvious fact, certainly obvious to me, that the role and work of voluntary accrediting bodies were given little or no attention (we are not invited to participate) in the development of these rules.

7. I object to these rules because rather than increase close and helpful cooperation between the federal government, which has a legitimate concern, and responsible education groups such as NHSC, these regulations will clearly destroy cooperation since they tend to weaken voluntary accreditation. I am fearful that it's very possible that if this trend is not reversed voluntary accreditation will be out of work entirely and we'll have a national school system under the control of the federal government. These regulations are a long step in that direction and I believe the direction is wrong.

8. I object to non-educators making very superficial assumptions and irrelevant rules about education. For example, apparently the FTC assumes that high completion rates are a guarantee of quality education. That's simply not true. It can just as well mean that courses of study that are very easy, lack depth, and allow students to quickly skim though, achieving high graduation rates.

For example, one of our best courses has one of the lowest completion rates at HSI -- Freshman Composition. Our math courses are very good. We're

proud of them, but they have low graduation rates. We have a new chemistry course. It will probably receive national awards. Recent testing of our correspondence students in the chemistry course showed them averaging 10% better than resident students on the same standardized examination. It's an exciting course, but our preliminary completion rates are bad. It's just too monumental a course. It's really a college level course and we're using it for high school students. I'm simply emphasizing that completion rates simply are not a defensible measurement for quality. As an educator I want challenging courses, not watered-down materials. I'm ashamed of the fact that today students can finish high school and not be able to read and yet the FTC standards are a strong encouragement to water down our courses.

9. I object to these rules because they tend to place reliance on statistics rather than the subjective judgments involving quality. This is where accreditation in America was 25 years ago. Accrediting people used to pay considerable attention to numbers of books in libraries, numbers of classrooms, teacher-student ratios, and so forth. Today they have learned that heavy dependence on statistics doesn't produce better education. FTC is taking us backwards.

Now I'd like to be more specific about the proposed rules. It is not my business to analyze them from a legal standpoint. I'd simply like to give you my reactions as an educator, as a head of an accredited private school.

Home Study Institute provides correspondence services from kindergarten through elementary, secondary, college, and we're now moving into post-graduate work on

the master's level in education and religion. Home Study Institute is actually the correspondence division of all the Adventist colleges and high schools. We serve a school system.

HSI was founded in 1909, its home office being in Takoma Park, Maryland. We have eight overseas branches and are currently enrolling between seven and eight thousand students. We have on our records approximately 150,000 graduates. Although Home Study Institute is nonprofit and serving colleges, the advice we have received concerning the current FTC proposed regulations is that we probably are included since we are providing occupational training in the areas of accounting, business, clerical, secretarial, and to a degree in the field of teaching. Furthermore, we do not have a two-year program as required by the regulations. Home Study Institute is nonprofit; however, we charge tuition and we live on our tuition. Thus far we have a history of operating in the black every year of HSI's existence. But in the past dozen years that margin has been very, very thin.

If these regulations are really enforced I'm in touble. Let me explain why.

1. The regulations require that I tell prospective students the percentage who will get the jobs for which they've trained. This is virtually impossible for us to be accurate about. Many of our students have no intention of getting jobs as a result of their studies, but some do. Some take our courses in order to become Bible instructors. Some take our courses to either get a job or improve their effectiveness in business, accounting, bookkeeping, or secretarial skills. Some take courses from us to maintain their certification as teachers. In discussing this with my staff, we believe that the administrative mechanism to get some kind of report would cost us

enough to put us in the red. It would require the adding of at least one full-time salary to our staff with no off-setting income. And what really irks me is that there is no apparent way that we can really do this as the FTC regulations apparently want. We simply would search for some way to be in compliance with the letter of the law, but not the spirit. This regulation implies somehow that we are dishonest, or tricky. We can comply. We can do what the FTC asks for, but only with the letter of the law, not the intent or spirit of the law. We simply cannot give the students anything understandable or helpful to them in making their decisions about a particular course. In other words, the statistics simply don't give the picture. We can tell a student what others have done, what has happened to them, we can do our very best to counsel a student attempting to find out as much as possible what his strength and weaknesses are. This is admittedly difficult by correspondence and so we have to depend on local counselors but I just have to throw up my hands on this regulation.

It may well be said that this rule doesn't apply to us. It seems to me that it does. If it doesn't, that's wonderful, but you're going to have to establish new regulations to regulate who's going to be regulated. The HSI situation points up this problem. I defy anyone to draw a clean, clear line between proprietary, non-profit, private, and public correspondence education. Most of the correspondence divisions of public universities that I'm acquainted with are required to pay their own way. Most of the correspondence divisions of public universities are now advertising. It's my observation that a majority of the proprietary correspondence schools are much more education-oriented than profit-oriented. Do not make the sad mistake of accepting some kind of

a stereotype that private correspondence educators are only interested in a huge margin of profit and a good report to their stockholders. Many of them are hanging on desperately when they could well be making more money in some other field. Why? Because they sense a deep commitment to teach others the expertise they have.

2. I will be required to publish drop-out rates. Our graduation rates are good. But any rates that we publish would be very difficult, practically meaningless, to everyone involved. Many of our students come back later and finish. For example, through the years we have discovered that a rather sizeable percentage of both high school and college students will enroll in courses very early in the year with no intention of even starting until summer vacation. Are they drop-outs? Hardly. Second, many of our students get what they need before finishing and go happily on their way without taking the final examination.

Third, it's very hard to give an honest picture. For example, we have a very good course in Freshman Composition for college students. We've discovered that it's almost too good. Many students who enroll for both semesters will finish the first semester with a reasonably good grade but then during the second semester drop out and continue taking Freshman Composition in their local community college or wherever simply because it's easier there. Are they drop-outs in the sense that the FTC is using the term? What good purpose is served by publishing drop-out rates?

Our typical student is in his early twenties, he's in college or temporarily out but going back. He's intelligent, he's goal-oriented, and he's certainly not a

"dummy." Futhermore, this is quite typical of correspondence students in America generally, most of them have jobs and are seeking to upgrade themselves. They are not "dummies" and correspondence education is not easy. It's very low percentage that are being made suckers of by some salesman somewhere.

Change Magazine has a fascinating article entitled, "Controversial Research and Its Critics." In effect, we're bombing the whole community to get rid of one bad operator. My point is that the Federal Trade Commission standards are not only unnecessary, they are quite insulting to me as a professional educator, and they hurt me. I do not deny that some correspondence schools have been deceptive. Deception among educators is not confined to any segment of the educational community. From my experience, my viewpoint, from what I have seen, the deceptive ones are just a few, and it's very tough to be deceptive and maintain your accreditation. This I have seen. Please let voluntary accreditation deal with them. Please let state approval agencies withhold their approval. Please let the Office of Education develop its own criteria for eligibility for federal funds. But stop clobbering us with these regulations which are of no help to literally anyone.

As a private correspondence educator, affiliated with colleges and universities and providing occupational training, I'm caught in the middle. I don't like at all what I see. My plea is that the Federal Trade Commission work with the correspondence industry, with the accrediting body and not against it, to produce more effective education for the 3 million plus correspondence students in America. Thank you.